

EXHIBIT 2

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Trisha Tshudy	:	
	:	
<i>Plaintiff</i>	:	Civil Action No. 22-cv-03336
	:	
v.	:	
	:	Hon. Wendy Beetlestone
Pennsylvania State University	:	
	:	
<i>Defendant</i>	:	

DECLARATION OF REBEKAH SAIDMAN-KRAUSS

Rebekah Saidman-Krauss, of full age, hereby declares as follows:

1. I am the Associate Dean for Admissions and Financial Aid at Penn State Dickinson Law (“Dickinson Law”).
2. I make this Declaration on the basis of personal knowledge and my review of materials kept by Dickinson Law and The Pennsylvania State University (“PSU”) in the regular and ordinary course of business.
3. On December 18, 2019, Ms. Tshudy was offered admission to Dickinson Law and awarded a full-tuition scholarship. See 12/18/2019 Email (**Exhibit “A”**).
4. Ms. Tshudy’s offer letter indicated that her scholarship “will be renewed automatically in [her] second and third years so long as [she remains] in good standing under the honor code and academic rules. Id.
5. In connection with a January 2022 finding by Dickinson Law’s Honor Code Hearing Board, Ms. Tshudy’s scholarship was revoked as she was longer in good standing under the Honor Code. See 02/16/2022 Letter (**Exhibit “B”**).

6. Ms. Tshudy's scholarship was not revoked for her first three semesters (i.e. Fall 2020, Spring 2021, and Fall 2021), but it was revoked for the Spring 2022 semester and for the 2022-2023 academic year. Id.

7. Ms. Tshudy was advised that she had a balance due of \$26,688.00 and that she should contact the Admissions and Financial Aid Office should she wish to apply for loans to cover this balance, as well as any tuition owed for subsequent semesters. Id.

8. At the time her scholarship was revoked, Ms. Tshudy had sufficient time to apply for and receive loans to allow for them to satisfy her outstanding tuition balance for the Spring 2022 semester and cover the cost of her final semesters at Dickinson Law. To date, Ms. Tshudy has never contacted my office to inquire about the process of applying for loans.

9. I later learned that Trisha Tshudy contacted PSU's Bursar's Office April 6, 2022, April 27, 2022, June 6, 2022, and twice on August 1, 2022 to request that her scholarship be reinstated based upon her claim that it had been revoked in error.

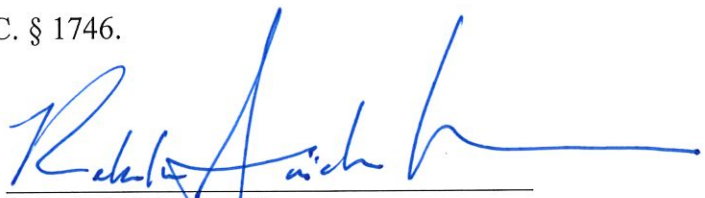
10. During the June 6, 2022 call with PSU's Bursar's Office, Ms. Tshudy stated that her scholarship "was removed in error" and requested that it be posted back to her account. The note for this conversation read as follows:

Comment DateTime 06/06/2022 3:52:44PM	
*Administrative Function	GEN General
*Academic Institution	The Pennsylvania State Univ
*Comment Category	BGEN SF GENERAL COMMENT
Variable Data	
Comment Data	
Comment ID	977724578
Department	UPBB UP Bursar
Comment Date	06/06/2022
Comments	<p>stu called about \$10,000 pa scholars award & \$16,688 merit scholarship or for sp22, tried calling cr law school but they haven't responded, called us because we helped before, wanted to know who to talk to in our office that could post the scholarships back, was told they were removed in error. Kelley M tried to contact someone @ cr law school & didn't get a response, contacted a couple people in osa & per that convo found that stu needs a cumulative gpa of 3.25 to keep awards & will need to speak to adv. stu said doesn't have an adv but will call cr law school & start w/ a dept & see if they can get them to the person that can assist. let stu know the 2 people in our office that they talked to are both out of the office until next mon.</p>
Append Comments	

11. On June 7, 2022, my colleague, Rebecca Schreiber, spoke with Kelley McCord, a PSU employee who works in the Office of Student Financial Services and who was aware of Ms. Tshudy's repeated outreach to PSU's Bursar's Office. Ms. McCord relayed to Ms. Schreiber that her impression was that Ms. Tshudy was attempting to convince her to reinstate the scholarship regardless of whether it was appropriate to do so.

12. At present, Trisha Tshudy's enrollment status at Dickinson Law is "matriculated student" in the PSU enrollment management database; she is not eligible to register for classes because of the Bursar Account Delinquent hold on her account as a result of her outstanding tuition balance.

13. I understand that this Declaration is made subject to the penalties relating to unsworn falsification to authorities, 28 U.S.C. § 1746.



Rebekah Saidman-Krauss
Associate Dean for Admissions and Financial Aid

Dated: September 8, 2022

EXHIBIT A

From: [Rogers, Lori M](#)
To: [Saidman-Krauss, Bekah Anna](#)
Cc: [Rogers, Lori M](#)
Subject: Trisha Tshudy Admission Offer FW: Penn State Dickinson Law
Date: Thursday, February 10, 2022 9:01:48 AM
Attachments: [image001.png](#)
[image002.png](#)

From: Rogers, Lori M
Sent: Wednesday, December 18, 2019 2:25 PM
To: TTSHUDY3@GMAIL.COM
Subject: Penn State Dickinson Law

December 18, 2019

Dear Trisha,

You did it! On behalf of Dean Danielle M. Conway and our entire faculty, I am thrilled to offer you admission to Penn State Dickinson Law's Class of 2023! As a Dickinson Law alumna, I am both delighted and proud to welcome you to our community of innovative thinkers, reputable scholars, and passionate advocates.

In recognition of your accomplishments and in anticipation of the contributions that we hope you will bring to Dickinson Law, I am pleased to offer you a full-tuition scholarship. Your scholarship will be renewed automatically in your second and third years so long as you remain in good standing under the honor code and academic rules.

Because you were admitted to Dickinson Law through our binding Early Decision program, you contractually agreed to enroll at Dickinson Law in the fall semester if admitted. To honor this commitment, your initial deposit of \$500 is due no later than January 15, 2020. Additionally, you must withdraw any pending applications to other law schools, and you may not initiate any new applications.

The best way to learn about us—or any law school, for that matter—is to visit in person. Because we believe that you will appreciate the Dickinson Law difference when you arrive on campus, we are happy to provide you with a travel stipend to reduce the cost of your visit. We will be hosting three dedicated admitted student events in the spring semester, but you are welcome to visit us at any time. We are conveniently located about 20 minutes outside of Harrisburg, the state capital, as well as an easy drive or a short train ride from Philadelphia (120 miles), Washington, D.C. (115 miles), Baltimore (90 miles), and New York City (190 miles). Please [contact us](#) to schedule your visit.

For 185 years, Dickinson Law graduates have included the nation's most distinguished attorneys, judges, government and corporate leaders, and legal educators. We could not be more excited to invite you to become part of this long and proud history of distinction. We believe that you are an exceptional applicant and will have many offers from which to choose,

but we hope that you will make the decision to join Dickinson Law's Class of 2023! In the meantime, feel free to join the Facebook group for [Dickinson Law's Class of 2023](#) to connect with your future classmates.

To reserve your seat and your scholarship, you will need to pay two nonrefundable \$500 deposits, the first of which, as mentioned, is due January 15. Please visit the admitted student section of our website (dickinsonlaw.psu.edu/2023) for more detailed information about academic standing, deposit payments, scholarship retention, travel stipends, and much more. Should you have any additional questions in the coming months or if you would prefer to speak with someone over the phone, do not hesitate to reach out to the admissions office directly at 717-240-5207.

Sincerely,

Bekah Saidman-Krauss

Assistant Dean for Admissions & Financial Aid
Penn State Dickinson Law
Lewis Katz Hall
150 South College Street
Carlisle, PA 17013



EXHIBIT B



PennState
Dickinson Law

Danielle M. Conway
Dean and Donald J. Farage Professor of Law
Dickinson Law
The Pennsylvania State University
Lewis Katz Hall
150 South College Street
Carlisle, PA 17013

717-240-5208
dzc5647@psu.edu
dickinsonlaw.psu.edu

February 16, 2022

Ms. Trisha Tshudy
762 Palmyra Bellegrove Road
Annville, PA 17003

Dear Ms. Tshudy:

When you were admitted to Penn State Dickinson Law, you were awarded a full-tuition scholarship. Your acceptance letter stated that your scholarship would be renewed provided that you remained in good standing under both the Academic Rules and the Honor Code. As well, Dickinson Law's policy regarding scholarship retention is stated on the Law School's website:

<https://dickinsonlaw.psu.edu/grants-and-scholarships>.

As a result of your Honor Code violation, your scholarship will be revoked for the current semester and for the 2022-2023 academic year. Your balance due to the University for the current semester will be \$26,688 in the absence of your scholarship credit. You will see this change reflected in your student account as soon as the Bursar's office processes your scholarship revocation. Should you need to borrow loans to cover this balance or any future balance in subsequent semesters, please contact Rebecca Schreiber, Director of Admissions & Financial Aid, at rms822@psu.edu. Please note that Dickinson Law will not retroactively revoke the scholarship that you received for the three prior semesters during which you were enrolled.

Sincerely,

Danielle M. Conway
Dean and Donald J. Farage Professor of Law